

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE MF GLOBAL HOLDINGS LTD.
INVESTMENT LITIGATION

Case No. 12-MD-2338 (VM)

JOSEPH DEANGELIS, et al.,

Plaintiffs,

- against -

Case No. 11-Civ-7866 (VM)

JON S. CORZINE, et al.

Defendants.

ECF CASE

THIS DOCUMENTS RELATES TO:

The Commodity Customer Class Actions

**PLAINTIFFS' NOTICE OF MOTION FOR PRELIMINARY APPROVAL
OF PROPOSED SETTLEMENT WITH JPMORGAN CHASE BANK, N.A.**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Andrew J. Entwistle, dated March 19, 2013 (the "Entwistle Declaration"), the exhibits attached thereto, the contemporaneously-filed Plaintiffs' Memorandum of Law in Support of Motion for Preliminary Approval of Proposed Settlement with JPMorgan Chase Bank, N.A., all prior pleadings and proceedings in the consolidated class actions on behalf of former commodity customers of MF Global Inc., plaintiffs and interim customer representatives Augustus International Master Fund L.P., Bearing Fund LP, Kay P. Tee, LLC, Mark Kennedy, Robert Marcin, Thomas G. Moran, Paradigm Global Fund I Ltd., Paradigm Equities Ltd., Paradigm Asia Fund Ltd., PS Energy Group, Inc., Summit Trust Company, Henry Rogers Varner Jr., and Thomas S. Wacker (the

States District Judge, in Courtroom 20B, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on a date and at a time designated by the Court, for an Order, substantially in the form of the [Proposed] Order Preliminarily Approving Proposed Settlement and Providing for Notice attached hereto as Exhibit A (the “Proposed Order”), or any other form as the Court deems appropriate: (i) granting preliminary approval of the proposed settlement (the “Settlement”) as memorialized in the Settlement Agreement attached as Exhibit 1 to the Entwistle Declaration; (ii) conditionally certifying a class for purposes of the Settlement as defined in the Proposed Order (the “Settlement Class”); (iii) preliminarily appointing undersigned interim co-lead counsel as class counsel for purposed of the Settlement; (iv) approving the parties’ proposed forms and method of giving notice of the pendency of this action and the Settlement to the Settlement Class; (v) directing that notice be given to the Settlement Class members; and (vi) scheduling for July 1, 2013, or as soon thereafter as the Court deems appropriate, a hearing at which time the Court will consider (a) the parties’ request for final approval of the Settlement Class, the Settlement, and the Plan of Allocation, (b) entry of the [Proposed] Final Approval Judgment and Order of Dismissal, and (c) interim lead counsel’s application for an award of attorneys’ fees; and (vii) granting such other and further relief as the Court deems just and proper.

James W. Giddens, the trustee for the liquidation of MFGI pursuant to the Securities Investor Protection Act of 1970 (“SIPA”), 15 U.S.C. §§78aaa *et seq.* (the “Trustee”) and successor-in-interest to MFGI, supports this motion and the supporting memorandum of law.

Dated: March 19, 2013

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